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Stephens Media, LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

RIGHTHAVEN LLC, a Nevada limited-
liability company,

Plaintiff,

v.

THOMAS NEVEU, an individual,

Defendant.

THOMAS NEVEU, an individual,

Counterclaimant,

v.

RIGHTHAVEN LLC, a Nevada limited-
liability company; and STEPHENS MEDIA
LLC, a Nevada limited-liability company,

Counterdefendants.

Case No.: 2:10-cv-01674-GMN-LRL

**STIPULATION OF VOLUNTARY
DISMISSAL WITH PREJUDICE**

WHEREAS, Plaintiff Righthaven, LLC (“Righthaven”) filed a Complaint [Dkt. No. 1] alleging claims for copyright infringement against Defendant Thomas Neveu (“Neveu”) on September 27, 2010;

WHEREAS, Mr. Neveu filed an Answer to Righthaven’s Complaint and a Counterclaim against Righthaven and Stephens Media, LLC (“Stephens Media”) [Dkt. No. 9] on December 13, 2010;

WHEREAS, the Court entered a six-month stay of proceedings in this action on March 18, 2011 [Dkt. No. 36] due, in part, to certain health issues being experienced by Mr. Neveu;

WHEREAS, the Court’s six-month stay of proceedings recently expired;

WHEREAS, the parties recently consulted regarding the status of the above-referenced manner, including the condition of Mr. Neveu’s health; and

WHEREAS, the parties have concluded that the continuation of this action may adversely impact Mr. Neveu’s health and welfare and that it is in the best interests of all parties to resolve this matter.

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NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the parties pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii) that the Complaint filed by Righthaven and the Counterclaim filed by Mr. Neveu shall both be voluntarily dismissed, with prejudice, each party to bear their own respective attorney's fees and costs.

Dated this 23rd day of September, 2011.

THOMAS NEVEU

RIGHTHAVEN LLC

By: /s/ **Thomas Neveu**
THOMAS NEVEU

By: /s/ **Shawn A. Mangano**
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